

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

JASON MATTIS

:
:
: CRIMINAL NO: 22-CR-00461
:
: FILED ELECTRONICALLY
:
:

[PROPOSED] ORDER

AND NOW, this _____ day of _____, 2023, upon consideration of the foregoing Unopposed Motion for Continuance of Trial, and it appearing that the interests of justice are served by granting the requested continuance outweigh the best interests of the public and the Defendant in a speedy trial, it is hereby ORDERED and DECREED that pursuant to 18 U.S.C. § 3161 (h)(7)(A), said Motion is GRANTED. It is further ORDERED and DECREED that taking in to account the exercise of due diligence, the failure to grant the requested continuance would deny counsel for the defendant reasonable and adequate time necessary for effective preparation, therefore trial in this matter shall commence on the _____ day of _____, 20____ at _____ a.m. and the continuance period shall be marked excludable in accordance with 18 U.S.C. § 3161(h)(7)(B)(iv).

BY THE COURT:

Honorable Gene E.K. Pratter
United States District Court
for the Eastern District of Pennsylvania

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UNOPPOSED MOTION TO CONTINUE TRIAL

1. On or about February 15, 2023, this Court appointed undersigned counsel (“Ms. Rossman”) to represent Mr. Mattis in connection with the above-captioned matter. Shortly thereafter, the Court scheduled a trial date of May 22, 2023.
2. The government has provided significant discovery that defense counsel has provided to Mr. Mattis and preliminarily reviewed.
3. Ms. Rossman has requested additional discovery from the government that she anticipates receiving in the near future. Moreover, based on her review of the discovery provided to date, it is Ms. Rossman’s belief that she will need to consult with at least one expert in her representation of Mr. Mattis.
4. Ms. Rossman has consulted with AUSA Robert Eckert who is assigned to this matter and does not oppose a continuance of trial. Both Mr. Ecker and Ms. Rossman request a new date no earlier than September 2023.
5. Finally, Mr. Mattis does not oppose the requested relief as evidenced by the Waiver of Speedy Trial Rights attached hereto as Exhibit A.

WHEREFORE, Mr. De Mattis requests that this Court grant his Unopposed Motion to Continue Trial and reset this matter for the Fall of 2023 or later.

Respectfully Submitted,

/s/ Mariana Rossman

Mariana Rossman, Esquire

THE ROSSMAN FIRM LLC

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Dated: April 25, 2023

CERTIFICATE OF SERVICE

I, Mariana Rossman, Esquire, hereby certify that a true and correct copy of the attached Unopposed Motion to Continue Trial was electronically filed and is available for viewing via the CM/ECF system. A copy has also been sent via electronic mail to the below listed individuals:

Robert Eckert, Esquire
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Phila, PA 19106-4476
robert.eckert@usdoj.gov

/s/ Mariana Rossman
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Dated: April 25, 2023